



OPERATING PERMIT (Conditional Major) Issued Pursuant to Tennessee Air Quality Act

Date Issued:

Permit Number:

455512P

Date Expires: June 1, 2012

Issued To:

Universal Fasteners, Inc.

Installation Address:

200 Universal Drive
Centerville

Installation Description:

01 - Two (2) Natural Gas Boilers
02, 03, 07 - Electroplating Operations
04, 15 - Dip Coating Operations
08 - Automatic Spray Booth
17 - Four (4) Tumble Spray Machines

Emission Source Reference Nos.

41-0031

CONDITIONAL MAJOR SOURCE

The holder of this permit shall comply with the conditions contained in this permit as well as all applicable provisions of the Tennessee Air Pollution Control Regulations.

GENERAL CONDITION:

1. The application that was utilized in the preparation of this permit is dated December 14, 2001 (updated June 18, 2002) and signed by Todd S. Baldwin, Corporate Environmental Engineer of the permitted facility. If this person terminates his employment or is reassigned different duties such that he is no longer the responsible person to represent and bind the facility in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Technical Secretary of the change. Said notification shall be in writing and submitted within thirty (30) days of the change. The notification shall include the name and title of the new person assigned by the source owner or operator to represent and bind the facility in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the facility until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

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TECHNICAL SECRETARY

No Authority is Granted by this Permit to Operate, Construct, or Maintain any Installation in Violation of any Law, Statute, Code, Ordinance, Rule, or Regulation of the State of Tennessee or any of its Political Subdivisions.

NON TRANSFERABLE

POST AT INSTALLATION ADDRESS

SECTION I: The following conditions shall apply to all sections of this permit unless otherwise noted.

2. The permittee has elected to opt-out of being issued a major source operating permit pursuant to Division Rule 1200-3-9-.02(11)(a). The permittee would be considered a major source because their "potential to emit" value(s) for a single hazardous air pollutant (HAP), a combination of hazardous air pollutants (HAPs) and volatile organic compounds (VOCs) was greater than 10 tons, 25 tons, and 100 tons per year respectively, at the time of application. The permittee has agreed to be subject to limitations in order to be below the major source applicability threshold for a single HAP, any combination of HAPs, and VOCs of 10, 25, and 100 tons per year, respectively.

3. The permittee is placed on notice that **Conditions 5 and 6** of this permit contain limitations that allow the permittee to opt out of the major source operating permit program requirements specified in Rule 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations. Failure to abide by these limits will not only subject the permittee to enforcement action by the State of Tennessee, but it may also result in the imposition of Federal enforcement action by the United States Environmental Protection Agency and the loss of being Federally recognized as a conditional major source.

4. Any non-compliance with any condition(s) of this permit set to restrain the "potential to emit" below the applicability threshold(s) of 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations, shall be reported in writing to the Technical Secretary within three (3) working days of such discovery. This notification, at a minimum, shall include the identification of the source, identification of the permit condition(s) violated, and details of the violation.

5. Maximum volatile organic compounds emitted from this facility shall not exceed 99 tons during all intervals of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated December 14, 2001 from the permittee. The permittee has requested this limitation in order to opt out of Title V applicability.

6. Emissions of any hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act shall not exceed 9.5 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24.5 tons during all intervals of 12 consecutive months.

This emission limitation is established pursuant to Rule 1200-3-9-.02(11) of the Tennessee Air Pollution Control Regulations and the information contained in the application dated December 14, 2001 from the permittee. The permittee has requested this limitation in order to opt out of Title V applicability.

7. Purchase orders and invoices for all VOC and HAP containing materials along with current material safety and data sheets (MSDS) must be maintained and kept available for inspection by the Technical secretary or his representative. MSDS's must explicitly list the VOC content in pounds per gallon of coating and HAP content by weight. If MSDS's are not available with this information, vendor formulation data containing the required information for those materials must also be maintained. These records must be retained for not less than five years.

8. Visible emissions from any stack, vent, or opening to the atmosphere shall not exceed 20 percent opacity as determined by EPA Method 9 as published in the current 40 CFR 60, Appendix A. (6 minute average)

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9. Should proof of compliance for the pollutant(s) with emission limitation(s) placed on this permit be required, the emissions measuring test method(s) and procedure(s) are the following:

<u>Pollutant or Parameter</u>	<u>Testing Methodology</u>
Particulate Matter	EPA Method 5 as published in the current 40 CFR 60, Appendix A
Volatile Content of Surface Coatings	EPA Method 24 as published in the current 40 CFR 60, Appendix A

10. Excess emissions shall be addressed as specified in Chapter 1200-3-20 of the Tennessee Air Pollution Control Regulations.
11. A report stating the compliance status of this facility with permit **Conditions 5 and 6** shall be submitted by March 31 of every year beginning in 2004. This report shall cover the preceding calendar year, and shall include the records required by **Condition 15**.

This report shall be submitted to:

Columbia Environmental Assistance Center
 Division of Air Pollution Control
 2484 Park Plus Drive
 Columbia, TN 38401

12. The as-supplied VOC content of all VOC-containing materials to be used by this source shall be determined as follows:

All Coatings, Inks, Adhesives, Thinners, and Solvents - from Material Safety Data Sheets (MSDS) or manufacturer or vendor formulation data which explicitly list the VOC content in pounds per gallon of coating.

The results of these determinations shall be compiled in the following tabular format or an alternative format which readily provides the same required information. This table, along with MSDS or other supporting documentation for each material used, shall be maintained at the source location and made available for inspection by the Technical Secretary or his representative, beginning 180 days from the issue date of this permit. If new materials are used, or if material formulation is changed, the table shall be updated within 90 days from the initial date of usage of the new or altered material.

Process Material Description	Material Density (lb/gal)	VOC Content (lb/gal)
Material #1		
Material #2		
etc.		

13. This permit supersedes any previous permits for these sources.
14. The Permittee shall apply for renewal of this permit not less than 60 days prior to the permit's expiration date.

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15. Record keeping for all VOC/HAP emitting sources shall include a log of the following information:

(1) Emissions in tons of each Hazardous Air Pollutant, (2) Emissions in tons of all Hazardous Air Pollutants and (3) Emissions in tons of VOCs excluding water and/or exempt compounds for all input materials used during all intervals of 12 consecutive months. Logs containing information in the following format or an alternative format that provides the same information must be maintained at the source location and kept available for inspection by the Technical Secretary or his representative. These logs must be retained for a period of not less than five years.

MONTHLY LOG FOR {41-0031-04, 08, 15, 17} MONTH:

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YEARLY LOG FOR {41-0031-04, 08, 15, 17}

MONTH/ YEAR	VOC EMISSIONS TONS per MONTH	(*) VOC EMISSIONS TONS per 12 MONTHS	HAP-1 EMISSIONS TONS per MONTH	(*) HAP-1 EMISSIONS TONS per 12 MONTHS	HAP-2 EMISSIONS TONS per MONTH	(*) HAP-2 EMISSIONS TONS per 12 MONTHS	HAP-3 EMISSIONS TONS per MONTH	(*) HAP-3 EMISSIONS TONS per 12 MONTHS	HAP-4 EMISSIONS TONS per MONTH	(*) HAP-4 EMISSIONS TONS per 12 MONTHS	TOTAL HAP EMISSIONS TONS per MONTH	(*) TOTAL HAP EMISSIONS TONS per 12 MONTHS
1												
2												
3												
4												
5												
6												
7												
8												
9												
10												
11												
12												
13												
14												
15												
16												

(*) The Tons per 12 Month value is the sum of the VOC (or HAP) emissions in the 11 months preceding the month just completed + the VOC (or HAP) emissions in the month just completed. If data is not available for the 11 months preceding the initial use of this Table, this value will be equal to the value for tons per month. For the second month it will be the sum of the first month and the second month. Indicate in parentheses the number of months summed [i.e., 6 (2) represents 6 tons emitted in 2 months]

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SECTION II: SOURCE SPECIFIC CONDITIONS

41-0031-01 Two (2) Natural Gas Boilers 29.3 Million BTU per Hour (Total Input)

16. The stated design capacity of this source is 29.3 Million British Thermal Units per hour (MMBtu/hr). A construction permit must be obtained before exceeding this capacity. The Technical Secretary may require the permittee to prove compliance with this rate.
17. Particulate matter emitted from this source shall not exceed 0.5 pounds per hour. Compliance with this requirement may be indicated from compliance with **Conditions 8 and 19**.

This emission limitation is established pursuant to Rule 1200-3-7-.01(5) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated July 27, 1992 from the permittee.
18. Sulfur dioxide emitted from this source shall not exceed 0.5 pounds per hour. Compliance with this requirement may be indicated from compliance with **Condition 19**.

This emission limitation is established pursuant to Rule 1200-3-14-.01(3) of the Tennessee Air Pollution Control Regulations and the information contained in the agreement letter dated July 27, 1992 from the permittee.
19. Only natural gas shall be used as fuel for this source.

41-0031-02 Electroplating Process PLT-1 Nickel & Zinc Plating Scrubber Control

20. Process material input rate shall not exceed 140 pounds per hour. The Technical Secretary may require the permittee to prove compliance with this rate.
21. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet of exhaust gas (3.81 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.

41-0031-03 Electroplating Process PLT-2 Decorative Plating Scrubber Control

22. Process material input rate shall not exceed 140 pounds per hour. The Technical Secretary may require the permittee to prove compliance with this rate.
23. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet of exhaust gas (3.81 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.

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41-0031-04 Dip and Spin Lacquer Machine and Two Natural Gas Ovens
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24. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet of exhaust gas (1.45 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.
25. Volatile organic compounds (VOC) emitted from this source shall not exceed 32.3 tons during any period of twelve (12) consecutive months. Compliance with this condition shall be indicated from the logs required by **Condition 15**.
- Regardless of this source specific emission limit for VOCs, this facility shall not emit more than 99 tons of VOC during any period of twelve (12) consecutive months.
26. The logs required in **Condition 15** shall be updated within 30 days after the end of each month of operation of this source. These logs must be readily available for on-site inspection by the Technical Secretary or his representative within 3 days of a request to review the required information to be contained in the logs.

41-0031-07 Electroplating Process PLT-3 Copper & Black Nickel Plating Scrubber Control

27. Process material input rate shall not exceed 140 pounds per hour. The Technical Secretary may require the permittee to prove compliance with this rate.
28. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet of exhaust gas (3.81 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.

41-0031-08 Automatic Spray Paint Machine with Natural Gas Air Preheater
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29. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic foot of exhaust gas (1.71 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.
30. Volatile organic compounds (VOC) emitted from this source shall not exceed 27 tons during any period of twelve (12) consecutive months. Compliance with this condition shall be indicated from the logs required by **Condition 15**.
- Regardless of this source specific emission limit for VOCs, this facility shall not emit more than 99 tons of VOC during any period of twelve (12) consecutive months.
31. The logs required in **Condition 15** shall be updated within 30 days after the end of each month of operation of this source. These logs must be readily available for on-site inspection by the Technical Secretary or his representative within 3 days of a request to review the required information to be contained in the logs.

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41-0031-15 Dip and Spin Lacquer Machine and One Natural Gas Oven
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32. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic feet of exhaust gas (1.07 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.

33. Volatile organic compounds (VOC) emitted from this source shall not exceed 5.7 tons during any period of twelve (12) consecutive months. Compliance with this condition shall be indicated from the logs required by **Condition 15**.

Regardless of this source specific emission limit for VOCs, this facility shall not emit more than 99 tons of VOC during any period of twelve (12) consecutive months.

34. The logs required in **Condition 15** shall be updated within 30 days after the end of each month of operation of this source. These logs must be readily available for on-site inspection by the Technical Secretary or his representative within 3 days of a request to review the required information to be contained in the logs.

41-0031-17 Four (4) Tumble Spray Paint Machines

35. Particulate matter emitted from this source shall not exceed 0.02 grains per dry standard cubic foot of exhaust gas (0.43 lb/hr). Compliance with this requirement may be indicated from compliance with **Condition 8**.

36. Volatile organic compounds (VOC) emitted from this source shall not exceed 25.8 tons during any period of twelve (12) consecutive months. Compliance with this condition shall be indicated from the logs required by **Condition 15**.

Regardless of this source specific emission limit for VOCs, this facility shall not emit more than 99 tons of VOC during any period of twelve (12) consecutive months.

37. The logs required in **Condition 15** shall be updated within 30 days after the end of each month of operation of this source. These logs must be readily available for on-site inspection by the Technical Secretary or his representative within 3 days of a request to review the required information to be contained in the logs.

(END OF CONDITIONS)

CURRENT EMISSIONS REQUIREMENTS AND EMISSION SUMMARY

COMPANY NAME: Universal Fasteners/YKK

1. EMISSION SOURCE REFERENCE NUMBER: 41-0031

NONATTAINMENT: _____

ATTAINMENT: X

2. LOG NUMBER: 55512

3A. PERMIT STATUS: NEW _____
X RENEWAL _____
 _____ RELOCATION _____

3B. PREVIOUS PERMIT NUMBER: CONSTRUCTION: 945292P, 945321P, 955194P, 955530P, 955582P OPERATING: 052211F, 052212P, 052213P, 040734P, 052340P, 053143P

4. IDENTIFY IF ONLY A PART OF THE SOURCE IS SUBJECT TO THIS REQUIREMENT	5. POLLUTANT	6. APPLICABLE REQUIREMENT(S): TN AIR POLLUTION CONTROL REGULATIONS, 40 CFR, PERMIT RESTRICTIONS, AIR QUALITY BASED STANDARDS	7. LIMITATION	8. MAXIMUM ACTUAL EMISSIONS			9. MAXIMUM ALLOWABLE EMISSIONS	
				IN UNITS OF ITEM 7	POUNDS / HOUR	TONS / YEAR	POUNDS / HOUR	TONS / YEAR
Facility	VOC		99 tpy			99		99
Facility	HAP		9.5 tpy individual 24.5 tpy combined			9.5 24.5		9.5 24.5
01	PM	1200-3-7-.01(5)	0.5 lb/hr				0.5	2.19
	NO _x	1200-3-7-.07(2)	2.93 lb/hr				2.93	12.83
	SO ₂	1200-3-14-.01(3)	0.5 lb/hr				0.5	2.19
	VOC	1200-3-7-.07(2)	0.16 lb/hr				0.16	0.71
	CO	1200-3-7-.07(2)	2.46 lb/hr				2.46	10.78
02	PM	1200-3-7-.04(1)	0.02 gr/dscf				3.81	16.7
03	PM	1200-3-7-.04(1)	0.02 gr/dscf				3.81	16.7
04	PM	1200-3-7-.04(1)	0.02 gr/dscf				1.45	6.35
07	PM	1200-3-7-.04(1)	0.02 gr/dscf				3.81	16.7
08	PM	1200-3-7-.04(1)	0.02 gr/dscf				1.71	7.5
15	PM	1200-3-7-.04(1)	0.02 gr/dscf				1.07	4.7
17	PM	1200-3-7-.04(1)	0.02 gr/dscf				0.43	1.9
Facility	Opacity	1200-3-5-.01(1)	20%	SOURCE OF DATA FOR EMISSIONS IN ITEM 8: Data was taken from application dated December 2001 (update June 2002) and previous permit numbers listed above.				

IF THIS IS NOT A TITLE V SOURCE, IS THIS A DEFERRED SOURCE (SUBJECT TO NSPS OR NESHAAPS) OR A SYNTHETIC MINOR SOURCE?
 IF THE ANSWER IS YES, EXPLAIN: Conditional Major source for VOC and HAPs

ENGINEERING SPECIALIST: JEF DATE: April 28, 2003